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VIA ECF AND FACSIMILE (212-805-7986)

Hon. Paul G. Gardephe
United States District Court for the
Southern District of New York
40 Foley Square, Room 2240
New York, New York 10007

Re: *The Arthur Taubman Trust, et al. v. Knoedler Gallery, LLC, et al.*,
13 Civ. 3011 (PGG) (HBP)

Dear Judge Gardephe:

We represent plaintiffs in this action, and we write pursuant to Rule 4(B) of the Court's Individual Practices to request a page extension in connection with plaintiffs' oppositions to defendants' motions to dismiss.

On August 15, 2014, we received three separate motions to dismiss, one each from defendants (i) Ann Freedman, (ii) Knoedler Gallery and 8-31 Holdings, and (iii) Michael Hammer. Rather than oppose each motion with three separate opposition briefs, we propose to submit one omnibus opposition brief of no more than 50 pages. We respectfully request permission to exceed the Court's Rule 4(B) 25-page limit for this purpose.

Counsel to all defendants moving for dismissal have consented to this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Webster D. McBride".

Webster D. McBride

cc: All counsel of record (via ECF)